Federal Defenders OF NEW YORK,

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Southern District of New York

John J. Byrnes

Attorney-in-Charge

2007

Leonard F. Joy Executive Director

By Hand & ECF

Honorable Kenneth M. 1 United States District Judge Southern District of New York 500 Pearl Street

New York, NY 10007

Re: United States v. Angela Huang, et al. 06 Cr. 1006 (KMK)

Dear Judge Karas,

With the gracious consent of the government, I write on behalf of my client, Bouhari Adoyi, to request a second extension of the scheduled deadline for the filing of the defendant's reply in the above-captioned case. Pursuant to Your Honor's order of August 7, 2007, Mr. Adoyi was to file his reply by Friday, August 17, 2007. Defendant's reply was to be filed today, August 3, 2007. We ask to be allowed to file our reply no later than August 27, 2007.

I am sorry to be making a second request for an extension. My prediction that an adequate reply could be prepared by August 17, 2007 was, in retrospect, unrealistic. Given the number of competing demands associated with my impending departure from the Federal Defenders of New York, relocation to New Orleans, Louisiana, and assumption of duties at the Orleans Public Defenders, completion of a meaningful reply by the 17th is simply not possible. I apologize for the inaccuracy of my earlier prediction, and will not request another extension beyond the 27th.

I have discussed this matter with AUSA Steve Lee, whose understanding, patience, and professional courtesy has been commendable and is deeply appreciated. On behalf of the government, he consents to an extension of the filing date to August 27, 2007.

I may be reached at (212) 417-8761 if more information is required.

Christopher A. Flood
Counsel for Bouhari Adoyi for Mr. Adoyin His

Toly pages are due by August 27,209.

CC: Steve Lee

Assistant United States Attorney

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